



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 28, 2021

By ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Iloulian,
21 Cr. 579 (PGG)

MEMO ENDORSED:

The conference currently scheduled for October 1, 2021 is adjourned to **October 7, 2021 at 4:30 p.m.**

SO ORDERED.

Paul G. Gardephe
United States District Judge

Dated: September 30, 2021

Dear Judge Gardephe:

The Government writes to respectfully request that the Court (i) reschedule the initial pretrial conference ("Pretrial Conference") in the above-captioned matter, currently scheduled for October 1, 2021, and (ii) exclude time pursuant to the Speedy Trial Act until the date set for the Pretrial Conference.

As background, on September 23, 2021, the indictment against the defendant was unsealed, and the defendant was presented before the Honorable James L. Cott, United States Magistrate Judge, at which time he was bailed upon certain conditions. In the process of seeking to schedule the defendant's arraignment in Magistrate Court, the Government learned that the defendant is retaining new counsel, who is unavailable this week due to the Jewish holidays; accordingly, the Government is requesting that Magistrate Court schedule the defendant's arraignment for October 5, 2021. On September 28, 2021, the Court scheduled the Pretrial Conference for October 1, 2021 at 11:00 a.m.

In light of the foregoing, the Government respectfully asks that the Court reschedule the Pretrial Conference for a date after October 5, 2021.

Additionally, the Government respectfully requests that the time between today and the Pretrial Conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), to allow the parties time (1) to produce and review discovery, and (2) to engage

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in discussions regarding a potential pretrial resolution of this matter. The Government respectfully submits that the proposed exclusion would be in the interest of justice. The Government has not consulted defense counsel about this request.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: _____ /s/

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Assistant United States Attorney
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cc: Counsel of record